



COLORADO

**Colorado Water
Conservation Board**

Department of Natural Resources
1313 Sherman Street, Room 718
Denver, CO 80203

June 21, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Comment on WT Docket No. 19-116
In the Matter of Allocation and Service Rules for the 1675-1680 MHz Band

Dear Secretary Dortch,

I am writing to you as Director of the Colorado Water Conservation Board (CWCB) to express my concern about the Proposed Rule to reallocate the 1675-1680 MHz band for new, non-federal flexible wireless use. The CWCB, in collaboration with the Colorado Division of Water Resources (DWR), depends on the Geostationary Orbiting Environmental Satellites (GOES) Data Collection System (DCS) to support critical activities such as intrastate water administration and flood mitigation decisions. The CWCB is concerned that powerful transmissions in bands adjacent to the relatively weak satellite download bands may compromise the ability of the GOES system to download information in a timely manner.

The CWCB uses the GOES satellite system to transmit information from over 650 stream and canal gauges in real-time. We use data from these gauges, as well as several dozen gauges operated by other organizations (including the U.S. Geological Survey and the Bureau of Reclamation) to make critical hour-by-hour water administration and flood mitigation decisions. Our ability to accurately track available water in the state allows DWR to properly allocate water to in-state water users through the prior appropriation system, resulting in a strong economic impact on farmers, municipalities, businesses, and environmental interests across the state. Accurate allocation to downstream states is also mandated through Interstate Compacts and requires real-time monitoring of flows and deliveries. In addition, our streamflow measurements are used by the National Weather Service and the Colorado Emergency Management Office to forecast and mitigate loss of life and property during flooding events. It is critical that these agencies have access to up-to-the-minute river stage and discharge values.

In summary, the Colorado Water Conservation Board is opposed to the allocation of the 1675-1680 MHz band for terrestrial mobile use. Any potential interference with operation of the GOES system threatens Colorado's ability to accurately administer water, fulfill our Interstate Compact obligations, and make informed flood safety decisions.

With best regards,

Rebecca Mitchell, P.E., Director of Colorado Water Conservation Board

